

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAY SCHUYLEMAN, an individual,

Plaintiff,

v.

BARNHART CRANE AND RIGGING CO.,
a State of Delaware Corporation

BARNHART CRANE AND RIGGING, LLC,
a State of Delaware Limited Liability
Company

UNKNOWN CORPORATION/LLC 1-25,

Defendants.

Civil Action No. 2:23-CV-00562-JLR

STIPULATED MOTION AND
[PROPOSED] ORDER FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT

NOTING DATE: MAY 10, 2023

The parties are in active discussions surrounding the claims in this complaint, and defense counsel requires further time to conduct an initial investigation suitable to respond to the complaint. Accordingly, all parties request that the Court enter an order extending the time for Defendant Barnhart Crane and Rigging to respond to Plaintiff Scuyleman's Complaint to May 24, 2023.

IT IS SO STIPULATED

Respectfully submitted this 10th day of May, 2023.

KLINEDINST PC

SEATTLE PATENT GROUP LLC

/s/ Gregor A. Hensrude

Gregor A. Hensrude, WSBA #45918
1200 Fifth Avenue, Suite 1750
Seattle, Washington 98101
206-672-4400
ghensrude@klinedinstlaw.com

Jim Haugen, WSBA #46978
Tom Hendrickson, WSBA #41832
4020 148th Avenue NE, Suite D
Redmond, WA 98052
425-202-7969
jlthaugen@seattlepatentgroup.com

Attorneys for Defendants
Barnhart Crane and Rigging Co., and
Barnhart Crane and Rigging, LLC

Attorneys for Plaintiff Jay Schuyleman

BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ PC

/s/ Emily Billig, with permission

Emily Billig, pending PHV
100 Light Street, 19th Floor
Baltimore, MD 21202
410-862-1089
ebillig@bakerdonelson.com

/s/ Scott M. Douglass, with permission

Scott M. Douglass, pending PHV
First Horizon Building
165 Madison Avenue, Suite 2000
Memphis, TN 38103
615-924-0514
sdouglass@bakerdonelson.com

Attorneys for Defendants
Barnhart Crane and Rigging Co., and
Barnhart Crane and Rigging, LLC

1 KLINEDINST PC

SEATTLE PATENT GROUP LLC



2
3 Gregor A. Hensrude, WSBA #45918
4 1200 Fifth Avenue, Suite 1750
5 Seattle, Washington 98101
6 206-672-4400
7 ghensrude@klinedinstlaw.com

Jim Haugen, WSBA #46978
Tom Hendrickson, WSBA #41832
4020 148th Avenue NE, Suite D
Redmond, WA 98052
425-202-7969
jlthaugen@seattlepatentgroup.com

8 Attorneys for Defendants
9 Barnhart Crane and Rigging Co., and
10 Barnhart Crane and Rigging, LLC

Attorneys for Plaintiff Jay Schuyleman

11
12 BAKER DONELSON BEARMAN
13 CALDWELL & BERKOWITZ PC

14 Emily Billig, pending PHV
15 100 Light Street, 19th Floor
16 Baltimore, MD 21202
17 410-862-1089
18 ebillig@bakerdonelson.com

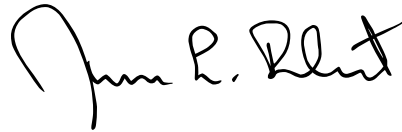
19 Scott M. Douglass, pending PHV
20 First Horizon Building
21 165 Madison Avenue, Suite 2000
22 Memphis, TN 38103
23 615-924-0514
24 sdouglass@bakerdonelson.com

25 Attorneys for Defendants
26 Barnhart Crane and Rigging Co., and
27 Barnhart Crane and Rigging, LLC

~~PROPOSED~~ ORDER

The Court hereby grants the Parties' Stipulated Motion for Extension of Time to Respond to Plaintiff's Complaint to May 24, 2023.

IT IS SO ORDERED on this 11th day of May, 2023.



The Honorable James L. Robart United
States District Court Judge